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**From:** Adrian Simmons [Adrian.Simmons@deq.ok.gov]  
**Sent:** 7/31/2017 8:58:55 PM  
**To:** don.hensch@deq.ok.gov; Kuziomko, Joseph [kuziomko.joseph@epa.gov]  
**CC:** Hillary Young [Hillary.Young@deq.ok.gov]  
**Subject:** RE: ORCR Project regarding OB/OD Sites in OK - Request for Information  
**Attachments:** P66 1995 Thermal Unit Approval.pdf; P66 1995 Thermal Unit Clean Closure Report.pdf

**Flag:** Follow up

Here is what I have been able to find out about the Thermal Treatment Unit at Phillips. I've attached both the report and the DEQ approval letter to this email.

Regarding your 10 clean-closure facilities:

**Clean Closed (CC) Facilities' questions:**

1. Did these sites complete clean closure or are they still in the process of seeking to clean close?
  1. Completed Clean Closure in 1995
2. Did the state officially certify/approve the unit(s) Clean Closed (CC)?
  1. Yes, the approval letter was mailed December 27, 1995
3. What was the volume of waste disposed, frequency (e.g., daily, weekly, monthly, periodically), and years of operation?
  1. The closure report estimates 4,200 pounds of waste treated, assuming 300 pounds of wastes per year treated over 14 years.
4. Was it OB or OD or both?
  1. Both
5. What sampling procedures were used to identify the extent of the contamination, including kick-out and fallout (e.g., geophysical techniques used to identify buried munitions and fragments; trenching; grid, spokes, meandering way, visual, or random sampling of soil/for kick-out; depth; until no more found; and ground water monitoring)?
  1. Soil sampling, with five samples.
6. Were components of the unit removed (e.g., any platforms, pans, pads, and liners)?
  1. Yes, fencing and the wooden barrier
7. What clean-up procedures and techniques were used to clean up the contaminants (e.g., excavation, soil sifting)?
  1. excavation
8. What data was recorded and metrics used to evaluate the extent and levels of contamination?
  1. Soil sampling results were recorded in micrograms per kilogram
9. What criteria was used to certify clean closure (e.g., EPA action levels)?
  1. Sampling was conducted using EPA method 8240 for VOCs
10. What was the total cost to achieve Clean Closed (CC) status?
  1. Unknown

-Adrian Simmons

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**From:** Donald Hensch  
**Sent:** Monday, July 24, 2017 11:59 AM  
**To:** Adrian Simmons; Ray Roberts  
**Cc:** Jon Fields; Mike Stickney; Hillary Young  
**Subject:** ORCR Project regarding OB/OD Sites in OK - Request for Information

Jon just forwarded this to me, as the address they used for me is now invalid. The two sites in – Phillips 66, and Halliburton Osage Road, are being handled by you (or your staff), so I figured you would be the best folks to look into these.

FWIW, the only “open burning” that I know of at the P66 site was a crude hydrofluoric acid burner they had back in the early 1980's. Basically a large drum/small tank, horizontal, with various holes in the sides and ends. They would inject a mixture of hydrocarbons and HF acid, and let it burn over time. There were no emissions controls, and as I recall there wasn't even a stack on it. According to RCRAInfo, P66 closed a “Thermal Treatment” unit in December 1995. It was still in Interim Status at the time. I don't know if it was the same unit or if there was a different one. I have requested the correspondence files from Central Records, for that period, so Adrian can look at them.

As for Halliburton, RCRAInfo only shows that an “Open Burning” unit was clean closed in 1988; no other info is available. I have no idea on how this closure was done, or what records are available. Ray, good luck with this one.

Please note that the requested response date is July 31, which is next Monday. I will contact Mr. Koziomko and see if he can extend that a little bit, and also to include Mike Stickney on any future emails. I'll let you know if I receive anything else.

*Donald A. Hensch, P.E.*  
Engineering Manager  
RCRA Permits and Corrective Actions Section  
Land Protection Division  
OK Department of Environmental Quality  
(405) 702-5152

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**From:** Jon Fields  
**Sent:** Monday, July 24, 2017 11:03 AM  
**To:** Donald Hensch  
**Subject:** FW: ORCR Project regarding OB/OD Sites in OK

Don,

Have you responded to anyone on this matter?

Thank you,

*Jon J. Fields, Jr.*  
Environmental Programs Specialist II  
Groundwater Assessment Unit  
Hazardous Waste Permitting and Corrective Action Section  
Land Protection Division  
Oklahoma Department of Environmental Quality  
(405) 702-5145

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**From:** Kuziomko, Joseph [mailto:kuziomko.joseph@epa.gov]  
**Sent:** Monday, July 17, 2017 11:06 AM  
**To:** Al Coulter; donald.hensch@deg.ok.gov; Jon Fields  
**Cc:** Shuster, Kenneth; Pena-Molina, Ana; Kohler, Amanda  
**Subject:** ORCR Project regarding OB/OD Sites in OK

I am writing to seek information on the closure status of the Open Burn/Open Detonation (OB/OD) units listed below to assist ORCR in a new project to assess closure of OB/OD units. With this information, EPA will be able to identify, evaluate, and document procedures, techniques, and criteria to assess, clean up, and close OB/OD units/sites in a standardized manner.

EPA has been documenting soil and ground water contamination from OB/OD units and the costs to clean them up. Given the inordinate extent of contamination and costs of clean-up that have been reported, we are now seeking to learn more about the monitoring, clean-up procedures, successes, and costs of these efforts. There is currently no national guidance on procedures to assess, monitor, and clean up OB/OD sites, nor metrics to achieve clean closure of OB/OD units. We are requesting information on the clean closure (CC) of OB/OD sites to assist us.

Please first verify the following codes for your facilities in Oklahoma.

Oklahoma							
FACILITY_ID	FACILITY_NAME	UNIT_NAME	UNITs	UNIT_DETAIL_SEQ	Legal Status	Operating Status	EFFECTIVE_DATE
OKD007233836	PHILLIPS 66 PONCA CITY REFINERY	THERMAL TREATMENT	23	3	IT	CC	19951227
OKD980623045	HALLIBURTON SVCS OSAGE RD FAC	OPENBURNING	1	1	IT	CC	19880429

**Questions:**

We have a number of questions we hope you can answer regarding your clean closed/closing sites. The operating status of the facilities will determine which sets of questions are to be answered. We understand that some of this data may be difficult to find but we would really appreciate if you could dig it up for us as it will help us move forward with this project and eventually help EPA update OB/OD closing procedures.

**Clean Closed (CC) Facilities' questions:**

1. Did these sites complete clean closure or are they still in the process of seeking to clean close?
2. Did the state officially certify/approve the unit(s) Clean Closed (CC)?
3. What was the volume of waste disposed, frequency (e.g., daily, weekly, monthly, periodically), and years of operation?
4. Was it OB or OD or both?
5. What sampling procedures were used to identify the extent of the contamination, including kick-out and fallout (e.g., geophysical techniques used to identify buried munitions and fragments; trenching; grid, spokes, meandering way, visual, or random sampling of soil/for kick-out; depth; until no more found; and ground water monitoring)?
6. Were components of the unit removed (e.g., any platforms, pans, pads, and liners)?
7. What clean-up procedures and techniques were used to clean up the contaminants (e.g., excavation, soil sifting)?
8. What data was recorded and metrics used to evaluate the extent and levels of contamination?
9. What criteria was used to certify clean closure (e.g., EPA action levels)?
10. What was the total cost to achieve Clean Closed (CC) status?

We plan to have a contractor gather this information on a select number of sites from the states. The purpose of this current effort is to gather information on the status of cleanup at these sites to help us identify which sites have the best information for our contractor to follow up with. Thus, for this effort, we seek answers to questions 1-4 and the last question in each set, and for the remaining questions we seek whether or not good information exists to answer these questions. We hope to receive this information by **July 31<sup>st</sup>**. Thank you for taking time to assist us with this project. If you have any questions, please feel free to reach out to us. Any information that you may be able to provide will be helpful in our project.

Sincerely,  
Joseph Kuziomko  
703-347-8168

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